

**RENEWABLE ENERGY COALITION**

August 8, 2013

Idaho Public Service Commission  
P.O. Box 83720  
Boise, ID 83720-0074

Re: Comments on PacifiCorp 2013 Integrated Resource Plan  
Docket No. PAC-E-13-05

Dear Commission President Kjellander and Commissioners:

Thank you for the opportunity to provide comments on PacifiCorp's 2013 Integrated Resource Plan (IRP). The Renewable Energy Coalition (Coalition) is providing these comments for your review. The Coalition is a large group of primarily existing hydroelectric Public Utility Regulatory Policies Act (PURPA) qualifying facilities (QF) located in PacifiCorp's multi-state service areas. We have one primary issue which is the year of resource deficiency in the IRP.

PacifiCorp's 2013 IRP acknowledges the utility's need for capacity resources immediately, in 2013. However, the utility plans to use short-term power purchases in the wholesale market to meet those needs rather than building a new generating facility. Frequently in the past, a deficit year was anticipated years in advance and a new generating facility planned to come on line on or near the year of deficit. However, the availability of sufficient wholesale power allows PacifiCorp to delay the decision to build a new generating facility. PacifiCorp, in describing its resource situation with regulatory commissions, often refers to the next avoidable resource as a 2024 CCCT. This is questionable, because the next avoidable resource is power purchases in 2013 and demand reductions through demand control programs (DSM). We believe that their decision of how or when to fill a deficit, whether from purchased power, DSM or a new generating facility, does not negate the reality of a specific capacity deficit in 2013, which grows significantly each year of the planning horizon (see PacifiCorp 2013 IRP Volume 1, page 99, Table 5.12).

The Coalition has several members with operating hydro electric projects in Idaho that have existing and long-standing PURPA contracts with PacifiCorp, and have been receiving both capacity and energy payments. Contracts expiring and needing replacement could be impacted by avoided cost pricing based upon the year of deficit being established as 2024.

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The Coalition appreciates the Commission's consideration of these comments. We look forward to working with the Commission and PacifiCorp in establishing fair and reasonable contract terms for REC members in Idaho.

Sincerely,

A handwritten signature in black ink, appearing to read "John R. Lowe". The signature is fluid and cursive, with a large initial "J" and a long horizontal stroke at the end.

John R. Lowe  
Renewable Energy Coalition

# CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 8<sup>th</sup> day of August, 2013, I caused to be served a true and correct copy of the foregoing document to each of the following via the method so indicated:

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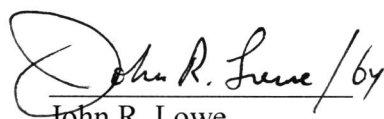

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 / by   
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